

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

MDL No. 16-2738 (MAS) (RLS)

**DECLARATION OF MATTHEW L. BUSH, ESQ., IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT
LLC'S MOTION TO EXCLUDE PLAINTIFFS' EXPERTS'
ASBESTOS-RELATED OPINIONS**

I, Matthew L. Bush, Esq., declare as follows:

I am an attorney and a partner with the law firm King & Spalding LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Motion to Exclude Plaintiffs' Experts' Asbestos-Related Opinions.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Judge Jim D. Lovett's Order Relating to Garlock Inc's Motion to Suppress Testimony of Dr. William Longo and Mr. Hatfield, issued on July 5, 2001 in the matter entitled *In Re:*

Lamar County Asbestos Litigation Cases Filed or To be Filed by Waters & Kraus in Lamar County, Texas (Case ID: 100200548).

2. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt of Dr. William Longo's deposition on March 3, 2023, in *Hernandez-Valadez v. Johnson & Johnson, et al.*, No. 22CV012759 (Super. Ct. Ca., Alameda Cnty.).

3. Attached hereto as **Exhibit 3** is a true and correct copy of an excerpt of the transcript of Day 1 of the Rule 104 hearing regarding Dr. William Longo on May 29, 2024, in *Clark et al. v. Johnson & Johnson, et al.*, No. MID-L-003809-18AS (N.J. Super. Ct., Middlesex Cnty.).

4. Attached hereto as **Exhibit 4** is a true and correct copy of an excerpt of Mr. Paul Hess's deposition on July 10, 2024 in the above-captioned case.

5. Attached hereto as **Exhibit 5** is a true and correct copy of an excerpt from Int'l Agency for Research on Cancer, World Health Org., Volume 93, *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans: Carbon Black, Titanium Dioxide, and Talc* (2010).

6. Attached hereto as **Exhibit 6** is a true and correct copy of an excerpt of trial proceedings from March 5, 2019, in *Rimondi v. BASF Catalysts LLC, et al.*, No. MID-2912-17AS (N.J. Super. Ct., Middlesex Cnty.).

7. Attached hereto as **Exhibit 7** is a true and correct copy of Dr. William Longo's curriculum vitae.

8. Attached hereto as **Exhibit 8** is a true and correct copy of an excerpt of trial proceedings from February 7, 2019, in *Leavitt v. Johnson & Johnson, et al.*, No. RG17882401 (Super. Ct. Ca., Alameda Cnty.).

9. Attached hereto as **Exhibit 9** is a true and correct copy of Dr. Mark Rigler's curriculum vitae.

10. Attached hereto as **Exhibit 10** is a true and correct copy of an excerpt of Dr. William Longo's deposition on February 5, 2019 in the above-captioned case.

11. Attached hereto as **Exhibit 11** is a true and correct copy of an excerpt of Dr. Mark Rigler's deposition on February 6, 2019 in the above-captioned case.

12. Attached hereto as **Exhibit 12** is a true and correct copy of an excerpt of trial proceedings from February 26, 2019, in *Olson v. Brenntag N. Am., Inc.*, No. 190328 (Sup. Ct. N.Y., N.Y. Cnty.).

13. Attached hereto as **Exhibit 13** is a true and correct copy of an excerpt of trial proceedings from May 31, 2018, in *Brick v. Brenntag N. Am., Inc.*, No. BC674595, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

14. Attached hereto as **Exhibit 14** is a true and correct copy of an excerpt of trial proceedings from October 19, 2018, in *Allen v. Brenntag N. Am., Inc.*, No. DR180132 (Super. Ct. Ca., Humboldt Cnty.).

15. Attached hereto as **Exhibit 15** is a true and correct copy of an excerpt of Judge John J. Kralik's Rulings on Motions in Limine, issued on July 23, 2018 in

the matter entitled *Weirick, et al., v. Brenntag N. Am., Inc., et al.*, No. BC656425, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

16. Attached hereto as **Exhibit 16** is a true and correct copy of an excerpt of trial proceedings from October 1, 2018, in *Allen v. Brenntag N. Am., Inc.*, No. DR180132 (Super. Ct. Ca., Humboldt Cnty.).

17. Attached hereto as **Exhibit 17** is a true and correct copy of an excerpt of Dr. William Longo's deposition on August 23, 2017, in *Herford et al., v. AT&T Corp., et al.*, No. BC646315, JCCP No. 4674 (Super. Ct. Ca., L.A. Cnty.).

18. Attached hereto as **Exhibit 18** is a true and correct copy of an excerpt of trial proceedings from May 15, 2018, in *Anderson et al., v. Borg-Warner Corp., et al.*, No. BC666513, JCCP No. 4674 (Super. Ct. Ca., L.A. Cnty.).

19. Attached hereto as **Exhibit 19** is a true and correct copy of an excerpt of Dr. William Longo's deposition on July 18, 2002, in *Starkweather v. ACandS, Inc., et al.*, No. 00-9030 (Super. Ct. Mass., Middlesex Cnty.).

20. Attached hereto as **Exhibit 20** is a true and correct copy of an excerpt of Dr. William Longo's deposition on May 28, 2022, in *Manbodh v. Hess Oil Virgin Islands Corp., et al.*, No. 324/1997 (V.I. Terr. Ct.).

21. Attached hereto as **Exhibit 21** is a true and correct copy of Perkins R.L. and Harvey B.W., U.S. Env't'l Protection Agency, *Test Method: Method for the Determination of Asbestos in Bulk Building Materials*, R-93 (June 1993).

22. Attached hereto as **Exhibit 22** is a true and correct copy of the International Organization for Standardization Standard entitled ISO 10312 Ambient air – Determination of Asbestos fibres – Direct-Transfer transmission electron microscopy method, dated May 1, 1995.

23. Attached hereto as **Exhibit 23** is a true and correct copy of Nat'l Inst. for Occupational Health and Safety, *Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research* (2011).

24. Attached hereto as **Exhibit 24** is a true and correct copy of Drs. William Longo and Mark Rigler's Second Supplemental Report dated February 1, 2019, issued in the above-captioned case.

25. Attached hereto as **Exhibit 25** is a true and correct copy of an excerpt of Dr. William Longo's deposition on April 17, 2019, in *Weirick, et al., v. Brenntag N. Am., Inc., et al.*, No. BC656425, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

26. Attached hereto as **Exhibit 26** is a true and correct copy of an excerpt of a transcript from the U.S. Food and Drug Administration's February 4, 2020 Public Meeting on Testing Methods for Asbestos in Talc and Cosmetic Products Containing Talc.

27. Attached hereto as **Exhibit 27** is a true and correct copy of Dr. William Longo's Fourth Supplemental Report dated April 29, 2024, issued in the above-captioned case.

28. Attached hereto as **Exhibit 28** is a true and correct copy of an excerpt of Dr. William Longo's deposition on February 8, 2021, in *Forrest v. Johnson & Johnson, et al.*, No. 1522-CC00419-02 (M.O Cir. Ct., St. Louis).

29. Attached hereto as **Exhibit 29** is a true and correct copy of a February 2023 chart entitled "Summary of MAS testing results of talc from Italy, Vermont, Montana, Brazil and China."

30. Attached hereto as **Exhibit 30** is a true and correct copy of an excerpt of Dr. William Longo's deposition on November 3, 2023, in *Eagles v. Arvinmeritor, Inc., et al.*, No. 22CV018294 (Super. Ct. Ca., Alameda Cnty.).

31. Attached hereto as **Exhibit 31** is a true and correct copy of an excerpt of trial proceedings from August 24, 2018, in *Weirick, et al., v. Brenntag N. Am., Inc., et al.*, No. BC656425, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

32. Attached hereto as **Exhibit 32** is a true and correct copy of an excerpt of Dr. William Longo's deposition on January 25, 2019, in *Young v. Johnson & Johnson et al.*, No. 1522-CC09728-02 (M.O Cir. Ct., St. Louis).

33. Attached hereto as **Exhibit 33** is a true and correct copy of an excerpt of the transcript of Day 2 of the Rule 104 hearing regarding Dr. William Longo on May 30, 2024, in *Clark et al. v. Johnson & Johnson, et al.*, No. MID-L-003809-18AS (N.J. Super. Ct., Middlesex Cnty.).

34. Attached hereto as **Exhibit 34** is a true and correct copy of an excerpt of Dr. William Longo's deposition on April 2, 2024, in *Clark v. Johnson & Johnson, et al.*, et al., No. MID-L-003809-18AS (N.J. Super. Ct., Middlesex Cnty.).

35. Attached hereto as **Exhibit 35** is a true and correct copy of an excerpt of Dr. William Longo's deposition on September 17, 2021, in *Bonnem v. Walgreen, Co., et al.*, No. 20L012414 (Cir. Ct. Ill., Cook Cnty.).

36. Attached hereto as **Exhibit 36** is a true and correct copy of the International Organization for Standardization Standard entitled ISO 22262-1 Air Quality – Bulk Materials – Part 1: Sampling and qualitative determination of asbestos in commercial bulk materials, dated July 1, 2012.

37. Attached hereto as **Exhibit 37** is a true and correct copy of a report issued by Dr. Su-Chun Su on January 30, 2022, titled "Talc Misidentified as Chrysotile – A review of MAS 71134 & M71376 Talcum Powder Analysis of Gold Bond Medicated Powder."

38. Attached hereto as **Exhibit 38** is a true and correct copy of an excerpt of Dr. William Longo's deposition on April 21, 2021, in *Prudencio v. Johnson & Johnson, et al.*, No. RG20061303 (Super. Ct. Ca., Alameda Cnty.).

39. Attached hereto as **Exhibit 39** is a true and correct copy of Dr. William Longo's report issued on February 28, 2023, in *Hernandez-Valadez v. Johnson & Johnson, et al.*, No. 22CV012759 (Super. Ct. Ca., Alameda Cnty.).

40. Attached hereto as **Exhibit 40** is a true and correct copy of a report issued by Dr. William Longo on October 8, 2020, titled “MAS Project #M71179 Chanel Supra H Retains.”

41. Attached hereto as **Exhibit 41** is a true and correct copy of an excerpt of Dr. William Longo’s deposition on July 23, 2019, in *Hayes v. Colgate-Palmolive Co., et al.*, No. 16-CI-03503 (Ky. Cir. Ct., Jefferson Cnty.).

42. Attached hereto as **Exhibit 42** is a true and correct copy of a report issued by Dr. Steven Compton on September 24, 2020, titled “Investigation of Chanel/Brenntag Specialties Supra H USP (Chinese) Talc Samples for Asbestos.”

43. Attached hereto as **Exhibit 43** is a true and correct copy of an excerpt of Dr. William Longo’s deposition on November 5, 2018, in *Kerkhof, et al., v. Brenntag N. Am. Inc., et al.*, No. 439392-V (G.A. Cir. Ct., Montgomery Cnty.).

44. Attached hereto as **Exhibit 44** is a true and correct copy of an excerpt of Dr. William Longo’s deposition on October 3, 2022, in *Chapman v. Avon Prods., Inc., et al.*, No. 22STCV05968, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

45. Attached hereto as **Exhibit 45** is a true and correct copy of an excerpt of Dr. William Longo’s deposition on May 2, 2024 in the above-captioned case.

46. Attached hereto as **Exhibit 46** is a true and correct copy of an excerpt of Dr. William Longo’s deposition on October 23, 2023, in *Eagles v. Arvinmeritor, Inc., et al.*, No. 22CV018294 (Super. Ct. Ca., Alameda Cnty.).

47. Attached hereto as **Exhibit 47** is a true and correct copy of a refractive index demonstrative prepared by counsel for Defendants.

48. Attached hereto as **Exhibit 48** is a true and correct copy of an excerpt of Dr. William Longo's deposition on May 3, 2024 in the above-captioned case.

49. Attached hereto as **Exhibit 49** is a true and correct copy of an excerpt of Dr. William Longo's deposition on September 25, 2020, in *Reyes v. Johnson & Johnson, et al.*, No. RG20052391 (Super. Ct. Ca., Alameda Cnty.).

50. Attached hereto as **Exhibit 50** is a true and correct copy of an excerpt of trial proceedings from July 7, 2021, in *Prudencio v. Johnson & Johnson, et al.*, No. RG20061303 (Super. Ct. Ca., Alameda Cnty.).

51. Attached hereto as **Exhibit 51** is a true and correct copy of an excerpt of Mr. Lee Poye's deposition on September 25, 2020, in *McNeal v. Autozone, Inc., et al.*, Case No. BC698965 (Super. Ct. Ca., L.A. Cnty.).

52. Attached hereto as **Exhibit 52** is a true and correct copy of an excerpt of a transcript of a case management conference on March 15, 2023, in *Hernandez-Valadez v. Johnson & Johnson, et al.*, No. 22CV012759 (Super. Ct. Ca., Alameda Cnty.).

53. Attached hereto as **Exhibit 53** is a true and correct copy of correspondence dated March 9, 2023, from Defendants' counsel to Plaintiff's

counsel regarding Dr. William Longo in the matter *Hernandez-Valadez v. Johnson & Johnson, et al.*, No. 22CVO12759 (Super. Ct. Ca., Alameda Cnty.).

54. Attached hereto as **Exhibit 54** is a true and correct copy of an excerpt of a transcript of a case management conference on March 23, 2023, in *Hernandez-Valadez v. Johnson & Johnson, et al.*, No. 22CV012759 (Super. Ct. Ca., Alameda Cnty.).

55. Attached hereto as **Exhibit 55** is a true and correct copy of an excerpt of Dr. William Longo's deposition on May 16, 2023, in *Streck v. Johnson & Johnson, et al.*, No. 21-CI-06290 (Ky. Cir. Ct., Jefferson Cnty.).

56. Attached hereto as **Exhibit 56** is a true and correct copy of an excerpt of Dr. William Longo's deposition on January 7, 2019, in *Rimondi v. BASF Catalysts, et al.*, No. MID-2912-17AS (N.J. Super. Ct., Middlesex Cnty.).

57. Attached hereto as **Exhibit 57** is a true and correct copy of an excerpt of Dr. William Longo's deposition on May 12, 2020, in *Zimmerman v. AutoZone Inc., et al.*, No. BC720153, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

58. Attached hereto as **Exhibit 58** is a true and correct copy of an excerpt of Dr. William Longo's deposition on September 14, 2018, in *Allen v. Brenntag N. Am., Inc., et al.*, No. DR180132 (Super. Ct. Ca., Humboldt Cnty.).

59. Attached hereto as **Exhibit 59** is a true and correct copy of an excerpt of Dr. William Longo's deposition on October 30, 2023, in *Lanzo v. Cyprus Amax Minerals Co., et al.*, No. MID-L-7385-16AS (N.J. Super. Ct., Middlesex Cnty.).

60. Attached hereto as **Exhibit 60** is a true and correct copy of an excerpt of Dr. William Longo's deposition on February 20, 2024, in *Krich v. Johnson & Johnson, et al.*, No. 21STCV22952, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

61. Attached hereto as **Exhibit 61** is a true and correct copy of an excerpt of Dr. William Longo's deposition on May 30, 2023, in *Zundel v. Amerilure, Inc., et al.*, No. 22-2145 (Ma. Super. Ct., Middlesex Cnty.).

62. Attached hereto as **Exhibit 62** is a true and correct copy of an excerpt of Dr. William Longo's deposition on September 15, 2023, in *Alexander-Jones v. Avon Prods., Inc.*, No. 22-2-18669-1-SEA (Super. Ct. Wa., King Cnty.).

63. Attached hereto as **Exhibit 63** is a true and correct copy of Scripa AE, Dimitriu DG, Dorohoi DO. Linear birefringence of polymer foils determined by optical means (2017). *J. Mol. Struct.* 2017;1140:67–70. doi: 10.1016/j.molstruc.2016.12.064.

64. Attached hereto as **Exhibit 64** is a true and correct copy of Lee, J, Yoon, C, Ham, S, Tsai, PJ (2015). Optimal Treatment Condition for Changing

Characteristics of Naturally Occurring Asbestos. *Aerosol Air Qual. Res.* 15: 2332-2345. <https://doi.org/10.4209/aaqr.2015.02.0108>.

65. Attached hereto as **Exhibit 65** is a true and correct copy of an excerpt of Stoiber, R, Morse, S, Chapman and Hall, New York (1994). *Crystal Identification with the Polarizing Microscope*.

66. Attached hereto as **Exhibit 66** is a true and correct copy of an excerpt from Int'l Agency for Research on Cancer, World Health Org., Volume 100, *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans: Part C: Arsenic, Metals, Fibres, and Dusts* (2012).

67. Attached hereto as **Exhibit 67** is a true and correct copy of an excerpt of Dr. Robert Cook's deposition on January 30, 2019 in the above-captioned case.

68. Attached hereto as **Exhibit 68** is a true and correct copy of U.S. Dept. of the Interior, Bureau of Mines Information Circular 8751, *Selected Silicate Minerals and Their Asbestiform Varieties, Mineralogical Definitions and Identification-Characterization* (1977).

69. Attached hereto as **Exhibit 69** is a true and correct copy of the International Organization for Standardization Standard entitled ISO 22262-2 Air Quality – Bulk Materials – Part 2: Quantitative determination of asbestos by gravimetric and microscopical methods, dated September 1, 2014.

70. Attached hereto as **Exhibit 70** is a true and correct copy of U.S. Dept. of the Interior, U.S. Geological Survey, *Some Facts About Asbestos* (March 2001).

71. Attached hereto as **Exhibit 71** is a true and correct copy of an excerpt of Dr. Daniel Clarke-Pearson's deposition on February 4, 2019 in the above-captioned case.

72. Attached hereto as **Exhibit 72** is a true and correct copy of an excerpt of Dr. Sonal Singh's deposition on January 16, 2019 in the above-captioned case.

73. Attached hereto as **Exhibit 73** is a true and correct copy of U.S. Pharmacopeia Method 901, *Detection of Asbestos in Pharmaceutical Talc* (2023).

74. Attached hereto as **Exhibit 74** is a true and correct copy of an excerpt of Dr. William Longo's deposition on March 29, 2018, in *Anderson et al., v. Borg-Warner Corp., et al.*, No. BC666513, JCCP No. 4674 (Super. Ct. Ca., L.A. Cnty.).

75. Attached hereto as **Exhibit 75** is a true and correct copy of Drs. William Longo and Mark Rigler's Supplemental Report dated March 11, 2018, issued in the above-captioned case.

76. Attached hereto as **Exhibit 76** is a true and correct copy of Drs. William Longo and Mark Rigler's report dated November 14, 2018, issued in the above-captioned case.

77. Attached hereto as **Exhibit 77** is a true and correct copy of a report issued by Dr. William Longo on September 6, 2018, titled “MAS TEM Coefficient of Variation for Tremolite and Anthophyllite in Talc: A Quality Control Study.”

78. Attached hereto as **Exhibit 78** is a true and correct copy of an excerpt of Dr. William Longo’s deposition on June 27, 2018, in *Von Salzen v. Am. Int’l Indus., Inc., et al.*, No. BC680576, JCCP Case No. 4674 (Super. Ct. Ca., L.A. Cnty.).

79. Attached hereto as **Exhibit 79** is a true and correct copy of Dr. Ellen Blair Smith’s report dated November 16, 2018, issued in the above-captioned case.

80. Attached hereto as **Exhibit 80** is a true and correct copy of Dr. Arch Carson’s report dated November 16, 2018, issued in the above-captioned case.

81. Attached hereto as **Exhibit 81** is a true and correct copy of Dr. Daniel Clarke-Pearson’s Second Amended Report dated November 15, 2023, issued in the above-captioned case.

82. Attached hereto as **Exhibit 82** is a true and correct copy of Dr. Michele Cote’s report dated November 15, 2023, issued in the above-captioned case.

83. Attached hereto as **Exhibit 83** is a true and correct copy of Dr. Sarah Kane’s report dated November 15, 2018, issued in the above-captioned case.

84. Attached hereto as **Exhibit 84** is a true and correct copy of Dr. Shawn Levy’s report dated November 15, 2023, issued in the above-captioned case.

85. Attached hereto as **Exhibit 85** is a true and correct copy of Dr. Anne McTiernan's report dated November 15, 2023, issued in the above-captioned case.

86. Attached hereto as **Exhibit 86** is a true and correct copy of Dr. Patricia Moorman's report dated November 15, 2023, issued in the above-captioned case.

87. Attached hereto as **Exhibit 87** is a true and correct copy of Dr. Laura Plunkett's report dated November 15, 2023, issued in the above-captioned case.

88. Attached hereto as **Exhibit 88** is a true and correct copy of Dr. William Sage's report dated November 15, 2023, issued in the above-captioned case.

89. Attached hereto as **Exhibit 89** is a true and correct copy of Dr. Jack Siemiatycki's Second Amended Report dated November 15, 2023, issued in the above-captioned case.

90. Attached hereto as **Exhibit 90** is a true and correct copy of Dr. Sonal Singh's Supplemental Report dated November 15, 2023, issued in the above-captioned case.

91. Attached hereto as **Exhibit 91** is a true and correct copy of Dr. Rebecca Smith-Bindman's Second Amended Report dated November 15, 2023, issued in the above-captioned case.

92. Attached hereto as **Exhibit 92** is a true and correct copy of Dr. Judith Wolf's Second Amended Report dated November 15, 2023, issued in the above-captioned case.

93. Attached hereto as **Exhibit 93** is a true and correct copy of Dr. John Godleski's case-specific report for plaintiff Tamara Newsome dated June 24, 2021, issued in the above-captioned case.

94. Attached hereto as **Exhibit 94** is a true and correct copy of Dr. John Godleski's case-specific report for plaintiff Anna Gallardo dated July 21, 2021, issued in the above-captioned case.

95. Attached hereto as **Exhibit 95** is a true and correct copy of Reid A, de Klerk N, Musk AW. Does exposure to asbestos cause ovarian cancer? A systematic literature review and meta-analysis. *Cancer Epidemiol Biomarkers Prev.* 2011 Jul;20(7):1287-95. doi: 10.1158/1055-9965.EPI-10-1302. Epub 2011 May 24. PMID: 21610219

96. Attached hereto as **Exhibit 96** is a true and correct copy of Reid A, Heyworth J, de Klerk NH, Musk B. Cancer incidence among women and girls environmentally and occupationally exposed to blue asbestos at Wittenoom, Western Australia. *Int J Cancer.* 2008 May 15;122(10):2337-44. doi: 10.1002/ijc.23331. PMID: 18098288.

97. Attached hereto as **Exhibit 97** is a true and correct copy of Reid A, Segal A, Heyworth JS, et al. Gynecologic and breast cancers in women after exposure to blue asbestos at Wittenoom. *Cancer Epidemiol Biomarkers Prev.* 2009 Jan;18(1):140-7. doi: 10.1158/1055-9965.EPI-08-0746. PMID: 19124491.

98. Attached hereto as **Exhibit 98** is a true and correct copy of Ferrante D, Bertolotti M, Todesco A, et al. Cancer mortality and incidence of mesothelioma in a cohort of wives of asbestos workers in Casale Monferrato, Italy. *Environ Health Perspect.* 2007 Oct;115(10):1401-5. doi: 10.1289/ehp.10195. PMID: 17938727; PMCID: PMC2022648.

99. Attached hereto as **Exhibit 99** is a true and correct copy of Dr. H. Nadia Moore's report dated February 25, 2019, issued in the above-captioned case.

100. Attached hereto as **Exhibit 100** is a true and correct copy of Camargo MC, Stayner LT, Straif K, Reina M, Al-Alem U, Demers PA, Landrigan PJ. Occupational exposure to asbestos and ovarian cancer: a meta-analysis. *Environ Health Perspect.* 2011 Sep;119(9):1211-7. doi: 10.1289/ehp.1003283. Epub 2011 Jun 3. PMID: 21642044; PMCID: PMC3230399.

101. Attached hereto as **Exhibit 101** is a true and correct copy of Slomovitz B, de Haydu C, Taub M, Coleman RL, Monk BJ. Asbestos and ovarian cancer: examining the historical evidence. *Int J Gynecol Cancer.* 2021 Jan;31(1):122-128. doi: 10.1136/ijgc-2020-001672. Epub 2020 Oct 9. PMID: 33037108.

102. Attached hereto as **Exhibit 102** is a true and correct copy of Acheson ED, Gardner MJ, Pippard EC, Grime LP. Mortality of two groups of women who manufactured gas masks from chrysotile and crocidolite asbestos: a 40-year follow-

up. *Br J Ind Med*. 1982 Nov;39(4):344-8. doi: 10.1136/oem.39.4.344. PMID: 6291580; PMCID: PMC1009064.

103. Attached hereto as **Exhibit 103** is a true and correct copy of Dr. Robert Cook's Amended Report dated January 22, 2019, issued in the above-captioned case.

104. Attached hereto as **Exhibit 104** is a true and correct copy of Dr. Mark Krekeler's report dated November 16, 2018, issued in the above-captioned case.

105. Attached hereto as **Exhibit 105** is a true and correct copy of an excerpt of Dr. Mark Krekeler's deposition on January 25, 2019 in the above-captioned case.

106. Attached hereto as **Exhibit 106** is a true and correct copy of Dr. Mary Poulton's general causation report dated February 25, 2019, issued in the above-captioned case.

107. Attached hereto as **Exhibit 107** is a true and correct copy of Dr. Shu-Chun Su's report dated May 21, 2024, issued in the above-captioned case.

108. Attached hereto as **Exhibit 108** is a true and correct copy of Dr. Judith Zelikoff's report dated November 16, 2018, issued in the above-captioned case.

109. Attached hereto as **Exhibit 109** is a true and correct copy of Dr. David Kessler's Amended Report dated November 15, 2023, issued in the above-captioned case.

110. Attached hereto as **Exhibit 110** is a true and correct copy of Stayner LT, Carreón-Valencia T, Demers PA, et al. Carcinogenicity of talc and acrylonitrile.

Lancet Oncol. 2024 Jul 4:S1470-2045(24)00384-X. doi: 10.1016/S1470-2045(24)00384-X. Epub ahead of print. PMID: 38976996.

111. Attached hereto as **Exhibit 111** is a true and correct copy of a demonstrative prepared by counsel for Defendants, which was marked as Exhibit 4 to Dr. William Longo's deposition on March 3, 2023, in *Hernandez-Valadez v. Johnson & Johnson, et al.*, No. 22CV012759 (Super. Ct. Ca., Alameda Cnty.).

112. Attached hereto as **Exhibit 112** is a true and correct copy of a report issued by Dr. William Longo on February 24, 2020, titled "MAS Project #M70484, Lisa Zimmerman's JBP Containers."

113. Attached hereto as **Exhibit 113** is a true and correct copy of Dr. Ann Wylie's report dated May 3, 2024, issued in the above-captioned case.

114. Attached hereto as **Exhibit 114** is a true and correct copy of a rebuttal report of Dr. Matthew Sanchez's rebuttal report issued on June 20, 2023.

115. Attached hereto as **Exhibit 115** is a true and correct copy of correspondence dated February 8, 1988, from Andrew Ulsamer to Thomas Germin.

116. Attached hereto as **Exhibit 116** is a true and correct copy of U.S. Dept. of the Interior, U.S. Geological Survey, *A USGS Study of Talc Deposits and Associated Amphibole Asbestos Within Mined Deposits of the Southern Death Valley Region, California* (2004).

117. Attached hereto as **Exhibit 117** is a true and correct copy of Dr. Matthew Sanchez's grid analysis for M68503-026.

118. Attached hereto as **Exhibit 118** is a true and correct copy of excerpts of Dr. Matthew Sanchez's rebuttal report dated August 30, 2019, issued in the above-captioned case.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 23, 2024



MATTHEW L. BUSH